

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
: Case No. 1:23-bk-01084-HWV
BRANDON MATTHEW JONES, : Chapter 13
Debtor :

HEARTHTRIDGE AT THE DOMINION, :
HOMEOWNERS ASSOCIATION, INC. :
Movant :
: :
v. : Motion for Relief from Automatic Stay
: by Hearthridge at the Dominion
: Homeowners Association, Inc.
: :
BRANDON MATTHEW JONES :
Respondent :

STIPULATION IN SETTLEMENT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY

It is hereby stipulated by and between Aaron S. Marines, Esquire and Russell, Krafft & Gruber, LLP, attorneys for Movant, Hearthridge at the Dominion Homeowners Association, Inc., and Nicholas G. Platt, Esquire, attorney for Debtor/Respondent, Brandon Matthew Jones, as follows:

1. The automatic stay of bankruptcy shall remain in full force and effect conditioned upon compliance with the terms of this Stipulation.
2. This Stipulation pertains to the property with an address of 2822 Woodmont Drive, York, PA 17404 (the "Unit").
3. The Parties agree that the post-petition arrearage amount of amount of \$1,545.25 will be added to the Claim of the Movant, Hearthridge at the Dominion Homeowners Association, Inc.

4. The Debtor agrees to file an amended Plan within thirty (30) days to add the post-petition arrearage amount to adjust the payments to the Movant under the Plan.

5. Should the Debtor/Respondent fail to pay the regularly due association assessments due after the entry of this stipulation directly to the Movant, Movant shall send Debtor/Respondent, by first class mail, and his counsel, by email, notice of default of this Stipulation. If the default is not cured within fifteen (15) days of the date of that Notice, Movant shall file a Certification of Default with the Court, and the Court shall enter an Order granting relief from the automatic stay. The Motion for Relief from Automatic Stay will waive Federal Rules of Bankruptcy Procedure 3002.1 and 4001(a)(3) so that such Order granting relief from the automatic stay is immediately effective and enforceable by Movant.

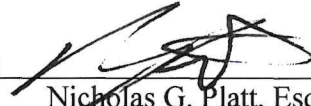
6. The parties request that this Court sign and docket an Order Approving the Stipulation in Settlement of the Motion for Relief.

Respectfully submitted,

RUSSELL, KRAFFT & GRUBER, LLP

/s/ Aaron S. Marines
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